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THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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April 4, 2024

**VIA ECF**

Hon. Barbara C. Moses  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Thompson v. The City of New York*  
Index No. 21 CV 10371 (JGLC)(BCM)

Dear Judge Moses:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel and represent The City of New York in the above-captioned case. I write in response to the Court's order as to whether Defendant is willing to participate in a mediation through the Court-annexed mediation program.

Defendant is amenable to participating in a mediation through the Court-annexed mediation program. Pursuant to the Court's order, Defendant took Plaintiff's deposition by videoconference on March 13, 2024, and has turned over all discovery documents in Defendant's possession, custody, and/or control prior to the close of discovery on March 15, 2024. Plaintiff's deposition transcript has been sent to Plaintiff by Defendant by USPS First Class Mail and should be in his possession for review. Plaintiff has made no application requesting that the discovery deadline be extended, nor has he made any additional requests for production since the discovery closed on March 15, 2024.

Prior to taking his deposition, Defendant provided Plaintiff with a reasonable settlement offer, which he rejected. As such, Defendant is willing to attempt to resolve Plaintiff's remaining claims through alternative dispute resolution and welcomes the opportunity to seek a mutually agreeable resolution to Plaintiff's claims in advance of an anticipated dispositive motion.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

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Bryn M. Ritchie

Assistant Corporation Counsel

**VIA FIRST CLASS MAIL**

cc: Kwaine Thompson  
DIN 23B0962  
Collins Correctional Facility  
P.O. Box 340  
Collins, NY 14034